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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEJANDRA SUSANA CASTILLO,

Defendant.

CASE NO. 2:24-CR-00325-DC

STIPULATION TO CONTINUE CHANGE OF
PLEA AND REGARDING EXCLUDABLE TIME
PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: January 10, 2025
TIME: 9:30 a.m.
COURT: Hon. Dena M. Coggins

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for a Change of Plea hearing on January 10, 2025.
2. By this stipulation, defendant now moves to continue the hearing until January 31, 2025, and to exclude time between January 10, 2025, and January 31, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes over 200 gb of investigative reports, surveillance video and photographs, forensic cellular phone examinations, and other related evidence. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b) Counsel for defendant relayed that her client just began a new medication on

1 January 5, 2025 that may have some impact on her ability to conduct a change of plea on January
2 10, 2025. Counsel for defendant desires additional time to consult with her client and ensure she
3 is ready to enter a change of plea. Additionally, should the case not resolve with a change of
4 plea as is currently expected, counsel for defendant needs additional time to consider pretrial
5 motions and otherwise prepare for trial.

6 c) Counsel for defendant believes that failure to grant the above-requested
7 continuance would deny her the reasonable time necessary for effective preparation, taking into
8 account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the
11 case as requested outweigh the interest of the public and the defendant in a trial within the
12 original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
14 et seq., within which trial must commence, the time period of January 10, 2025 to January 31,
15 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
16 T4] because it would result from a continuance granted by the Court at defendant's request on
17 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
18 best interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: January 6, 2025

PHILLIP A. TALBERT
United States Attorney

/s/ ADRIAN T. KINSELLA
ADRIAN T. KINSELLA
Assistant United States Attorney

Dated: January 6, 2025

/s/ Christina Sinha
Christina Sinha
Assistant Federal Defender
Counsel for Defendant
Alejandra Susana Castillo

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial. Accordingly, the Change of Plea hearing set for January 10, 2025 is vacated and reset for January 31, 2025 at 9:30 a.m. in Courtroom 8 before the Honorable Dena M. Coggins. Time is excluded as provided by Local Code T4 from January 10, 2025 through January 31, 2025.

IT IS SO ORDERED.

Dated: **January 7, 2025**


Dena Coggins
United States District Judge